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16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 HYDRAFACIAL LLC, formerly known as
EDGE SYSTEMS LLC, a California limited
19 liability company,

20 Plaintiff,

21 v.

22 MEDICREATIONS, LLC, a New York limited
liability company,

23 Defendant.
24

Case No.: 2:24-cv-00855-GMN-DJA

**STIPULATION AND ORDER
EXTENDING DEADLINE TO ANSWER
FIRST AMENDED COMPLAINT
(FIRST REQUEST)**

25 Defendant MEDICREATIONS, LLC (“Medicreations”) and Plaintiff HYDRAFACIAL
26 LLC, formerly known as EDGE SYSTEMS LLC (“Hydrafacial”), by and through their respective
27 undersigned counsel of record, the law firms of Holland & Hart LLP and Pillsbury Winthrop Shaw
28 Pittman LLP and the law firms of Dickinson Wright PLLC and Morgan, Lewis & Bockius LLP,

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1 hereby respectfully submit this *Stipulation and Order Extending Deadline to Respond to First*
2 *Amended Complaint (First Request)* and stipulate and agree to a fourteen (14)-day extension of the
3 current deadline (from March 14, 2025 to March 28, 2025) for Medicreations to answer
4 Hydrafacial's *First Amended Complaint* (ECF No. 20) to the extent not dismissed by the Court's
5 *Order* (ECF No. 26), which is the first requested extension, as follows:

6 1. On July 12, 2024, Hydrafacial filed its *First Amended Complaint* (ECF No. 20).
7 2. On July 26, 2024, Medicreations filed its *Motion to Dismiss* (ECF No. 22).
8 3. On August 9, 2024, Hydrafacial filed its *Opposition* to the Motion to Dismiss (ECF
9 No. 23), to which Medicreations replied on August 16, 2024 (ECF No. 24).

10 4. On February 28, 2025, the Court entered its *Order Granting in part Defendant's*
11 *Partial Motion to Dismiss* (ECF No. 26), wherein the Court ordered that "Plaintiff is given leave to
12 amend its willful and indirect infringement claims relating to the Shadduck Patents and Demand
13 Letter Patents. Plaintiff's claims for indirect infringement of the '477 and '287 Patents for actions
14 occurring before the Complaint and FAC were filed, and for willful infringement of the '477 and
15 '287 Patents, are dismissed without leave to amend." (ECF No. 20 at 12).

16 5. Pursuant to the Court's Order, "Plaintiff may have 21 days from the date of this
17 Order to file an amended complaint" (ECF No. 20 at 12)—*i.e.*, on or before March 21, 2025.

18 6. Hydrafacial has indicated that at this juncture, it does not intend on filing a second
19 amended complaint.

20 7. Federal Rule of Civil Procedure 12(a)(4)(A) requires that Medicreations respond to
21 the claims in the First Amended Complaint that survived the Court's Order (ECF No. 20) within "14
22 days after notice" thereof—*i.e.*, by March 14, 2025.

23 8. While Hydrafacial does not intend to file a second amended complaint, to ensure
24 that Medicreations' response date falls after the date within which Hydrafacial could amend its
25 complaint, the Parties hereby stipulate and agree to extend the current deadline for Medicreations to
26 answer Hydrafacial's First Amended Complaint (ECF No. 20) from March 14, 2025 to **March 28,**
27 **2025.**

9. This Stipulation is made in good faith, not for purposes of undue delay, and supported by good cause.

IT IS SO STIPULATED.

DATED this 12th day of March 2025.

HOLLAND & HART LLP

/s/ Lars K. Evensen

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IT IS SO ORDERED:


JUDGE DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

DATED: 3/13/2025

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CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of March 2025, a true and correct copy of the foregoing
**STIPULATION AND ORDER EXTENDING DEADLINE TO ANSWER FIRST AMENDED
COMPLAINT (FIRST REQUEST)** was served by the following method(s):

- ☒ Electronic: by submitting electronically for filing and/or service with the United States District Court, District of Nevada's e-filing system and served on counsel electronically in accordance with the E-service list to the following email addresses:

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